

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION

JAMES T. SMITH, ROBERT TERRY, )  
PAUL BROWN and HARVEY )  
EVERETT, )

08-C-0579

Plaintiffs, )

v. )

Judge Joan H. Lefkow

Magistrate Judge Nolan

INVSCO GROUP, LTD., PLAZA 440 )  
PRIVATE RESIDENCES )  
CONDOMINIUM ASSOCIATION, )  
ADMIRAL SECURITY SERVICES, INC. )  
and EDY KLEIN, )  
Defendants. )

**RULE 26(a) DISCLOSURES**

Defendant Invsco Group, Ltd., by and through its attorneys, The Patterson Law Firm, PC, and for its disclosures pursuant to Rule 26(a) of the Federal Rules of Civil Procedure states as follows:

**(i) The following individuals are likely to have discoverable information:**

Edy Klein  
Property Manager at Plaza 440  
440 North Wabash Ave.  
Chicago IL 60611

As Plaintiffs' direct supervisor, Ms. Klein has information pertaining to Plaintiffs' employment at Plaza 440. Specifically, Ms. Klein is likely to have information pertaining to Plaintiffs' disciplinary notices and her minimal supervisory duties after Admiral employed Plaintiffs. Ms. Klein also is likely to have information regarding Plaintiffs' misconduct while employed with Invsco and Plaza 440.

William O'Leary  
Plaza 440 Supervisor  
1030 North Clark Street  
Suite 300  
Chicago, IL 60610

As Ms. Klein's supervisor, Mr. O'Leary is likely to have knowledge of the management of Plaza 440. Mr. O'Leary is also likely to have knowledge pertaining to Invsco's decision to outsource Plaintiffs' employment. Mr. O'Leary also is likely to have information regarding Plaintiffs' misconduct while employed with Invsco and Plaza 440.

Julie Rossini  
Human Resources  
Invsco Group, Ltd.  
1030 North Clark Street  
Chicago, Illinois 60610

Mr. Rossini is likely to have information regarding Invsco Group, Ltd.'s policies regarding preventing discrimination. Ms. Rossini is also likely to have information regarding the employee handbook.

Chuck Patterson  
Plaza 440 Private Residences  
440 North Wabash  
Chicago, IL 60611

As assistant property manager of Plaza 440, Mr. Patterson is likely to have information regarding various performance warnings and complaints from residents regarding the Plaintiffs and regarding Plaintiffs' misconduct. Mr. Patterson is also likely to have information regarding rules for doormen and maintenance personnel.

Kweli Bond  
Plaza 440 Private Residences  
440 North Wabash  
Chicago, IL 60611

Ms. Bond is likely to have information regarding Mr. Smith's sixth performance warning wherein he allowed a nonresident to enter the building without calling anyone in the management office. Ms. Bond is also likely to have information regarding the written complaint that she filed with Ms. Klein on or about March 20, 2007. Ms. Bond is also likely to have information regarding an e-mail that she sent about an incident occurring January 22, 2007.

Scott Wadsworth  
Plaza 440 Private Residences  
440 North Wabash  
Chicago, IL 60611

Mr. Wadsworth is likely to have information regarding complaints from residents pertaining to Plaintiffs.

Michael Malicki  
Plaza 440 Private Residences  
440 North Wabash  
Chicago, IL 60611

Mr. Malicki is likely to have information regarding Plaza 440's decision to enforce civility requirements among the staff members.

John Zarris  
Service Employees International Union, Local 1  
111 E Wacker Dr.  
25<sup>th</sup> Floor  
Chicago, IL 60601

Mr. Zarris is likely to have knowledge of the nondiscriminatory nature of the various grievances brought by Plaintiffs.

Gene Weisskopf  
Admiral Security Services  
5940 West Tougy Ave.  
Suite 130  
Niles, IL 60714

Mr. Weisskopf is likely to have information concerning Admiral's contract with Plaza 440.

Phil Kulak  
Admiral Security Services  
5940 West Tougy Ave.  
Suite 130  
Niles, IL 60714

Mr. Kulak is likely to have information regarding the doormen's compliance or failure to comply with Admiral employment requirements, including the PERC card.

Jolie Stinson  
CRS Business Manager  
440 North Wabash  
Chicago, IL 60611

Ms. Stinson is likely to have information regarding Mr. Smith's poor work performance. Specifically, she is likely to have information regarding an incident that occurred pertaining to the residents of Unit 2708 on or around January 15, 2007, and Mr. Smith's poor attitude regarding that incident.

James Smith  
16341 Cottage Grove  
South Holland, Illinois 60473

James Smith is likely to have knowledge of facts relating to the disciplinary notices given to him by Chuck Patterson and Edy Klein.

Robert Terry  
4448 W. Thomas  
Chicago, Illinois 60651

Robert Terry is likely to have knowledge of facts relating to the disciplinary notices given to him by Edy Klein.

Paul Brown  
2404 E. Street  
Chicago, Illinois 60649

Paul Brown is likely to have knowledge of facts relating to the disciplinary notices given to him by Edy Klein.

Harvey Everett  
7 130 Ingleside  
Chicago, Illinois 60619

Harvey Everett is likely to have knowledge of facts relating to the disciplinary notices given to him by Edy Klein.

Jaime J. Huret  
Plaza 440 Private Residences  
440 North Wabash  
Chicago, IL 60611

Mr. Huret is likely to have information regarding an incident report that he filed on or about February 27, 2007, wherein he alleges that he overheard Mr. Smith speaking loudly on the phone while there were numerous residents in the lobby.

Stephanie Rhinehart  
Chris Malinky  
440 North Wabash  
Unit 2708  
Chicago, IL 60611

Ms. Rhinehart and Mr. Malinky are likely to have information regarding Mr. Smith's poor work performance. Specifically, they are likely to have information regarding a package that they did not receive on or around January 15, 2007, and Mr. Smith's poor attitude when they inquired as to the package's whereabouts.

Izola Phillips  
440 North Wabash  
Unit 4804  
Chicago, IL 60611

Ms. Phillips is likely to have information regarding Mr. Smith's use of profanity while she was in the lobby. Ms. Phillips is also likely to have information regarding an incident that she filed on or about December 12, 2006, regarding Mr. Smith's poor work performance. Ms. Phillips is also likely to have information about an incident report that she filed on or about December 12, 2006, regarding the failure of Mr. Terry to notify her of a pizza that was delivered.

Anna Morrison-Ricordati  
440 North Wabash  
Unit 5005  
Chicago, IL 60611

Mr. Morrison-Ricordati is likely to have information regarding an incident which occurred on or about September 26, 2006, involving Mr. Smith.

Ebony Bailey  
440 North Wabash  
Chicago, IL 60611

Ms. Bailey is likely to have information regarding a complaint that she filed regarding Mr. Smith on or about March 18, 2004.

Lee de Arila  
Paul Williams  
440 North Wabash  
Unit 4010  
Chicago, IL 60611

Mr. de Arila is likely to have information regarding a complaint that he filed on or about March 27, 2007, regarding Mr. Terry's poor work performance.

Jordan Kaplan  
440 North Wabash  
Unit 405  
Chicago, IL 60611

Mr. Kaplan is likely to have information regarding an incident in which his car was towed on or around October 25, 2006.

Caliz Gill  
Andrew Manilow  
440 North Wabash  
Unit 2705  
Chicago, IL 60611

Ms. Gill and Mr. Manilow are likely to have information regarding an incident report that they filed on or about February 7, 2007, regarding noise complaints that they reported to Mr. Brown, but which were not addressed or recorded.

**(ii) The following documents have been produced:**

- a. Former Personnel file for James Smith;
- b. Former Personnel file for Robert Terry;
- c. Former Personnel file for Paul Brown;
- d. Former Personnel file for Harvey Everett;
- e. Former Personnel file for Joe Colletti<sup>1</sup>;
- f. Personnel file for Edy Klein<sup>2</sup>;
- g. Management Agreement between Plaza 440 and Invsco Management Company, Inc. dated November 30, 2004;
- h. Collective Bargaining Agreement;
- i. IDHR Right to Sue Letter dated October 26, 2007;
- j. IDHR Right to Sue Letter dated October 29, 2007;
- k. IDHR Right to Sue Letter dated November 20, 2007;
- l. Orders of Closure for Brown and Smith from the IDHR;
- m. Verified Response for EEOC No. 21BA71821;
- n. Verified Response for EEOC No. 21BA71662;
- o. Verified Response for EEOC No. 21 BA 71809;
- p. Termination Notice to Paul Brown from Admiral Security Services, Inc.;
- q. James Smith's notes regarding charges in the Complaint; and
- r. Employee handbook.<sup>3</sup>

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<sup>1</sup> The former personnel file for Joe Colletti will be produced once an appropriate protective order has been entered.

<sup>2</sup> The personnel file for Edy Klein will be produced once an appropriate protective order has been entered.

<sup>3</sup> This handbook is not currently in counsel's possession, but will be produced upon its receipt.

- (iii) **Defendant Invsco denies that Plaintiff suffered any damages.**
- (iv) **Defendant Invsco does not have any insurance which may be liable to satisfy all or part of a possible judgment.**

Respectfully submitted,

/s/ Kristi Browne

Dated: May 21, 2008

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